

Exhibit B

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

RENE S. RYMAN, individually, and as
personal representative and next-of-kin of
Lowell Edward Ryman, Deceased,

Case No. CV-08-372

Plaintiff,

vs.

REGENTS OF THE UNIVERSITY
OF CALIFORNIA d/b/a LOS ALAMOS
NATIONAL LABORATORY, THE ZIA
COMPANY, and THE ZIA COMPANY,

Defendants.

AMENDED NOTICE TO TAKE CONTINUED DEPOSITION DUCES TECUM

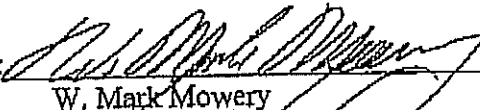
TO: **Rene Ryman**
c/o Michael T. Howell
Reich & Binstock, LLP
4265 San Felipe - Suite 1000
Houston, TX 77027

PLEASE TAKE NOTICE that Defendant Regents of the University of California d/b/a Los Alamos National Laboratory will take the deposition of Plaintiff Rene Ryman, before a certified court reporter, notary public and videographer on Monday, December 15, 2008, commencing at 9:00 a.m (CST) at the Dallas Love Field Airport, Love Field Conference Center - Houston Room, in Dallas, Texas.

To the extent not already produced, the witness is asked to bring with her to the deposition the items listed on Exhibit A attached hereto, for use as exhibits at the deposition.

Respectfully submitted:

RODEY, DICKASON, SLOAN, AKIN & ROBB, P.A.

By: 
W. Mark Mowery
Attorneys for Defendant Regents of the University of
California d/b/a Los Alamos National Laboratory
Post Office Box 1357
Santa Fe, NM 87504-1357
(505) 954-3900

We hereby certify that a true and accurate copy
of the foregoing pleading was sent by U.S. mail to:

Michael T. Howell
Dennis C. Reich
Kaitlin Clark
Reich & Binstock, LLP
4265 San Felipe - Suite 1000
Houston, TX 77027

Tim L. Fields
Earl E. DeBrine, Jr.
Joan D. Marsan
Modrall Law Firm
Post Office Box 2168
Albuquerque, NM 87103

David J. Jaramillo
Maria E. Touchet
Gaddy Law Firm
2025 San Pedro Drive, NE
Albuquerque, NM 87110-5951

on this 14th day of November, 2008.

Rodey, Dickason, Sloan, Akin & Robb, P.A.

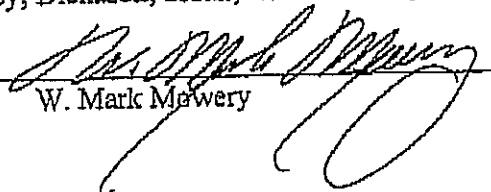
By: 
W. Mark Mowery

EXHIBIT A

1. A copy of your most current resume or curriculum vitae.
2. Copies of any medical records or reports you have for Lowell Ryman including, but not limited to, any medical records in which a healthcare provider makes any reference to a causal link between Lowell Ryman's multiple myeloma and exposure to plutonium or other radioactive materials while a resident of Los Alamos, New Mexico, and/or which you believe otherwise support the claims you have asserted in this case.
3. Copies of all bills or invoices including, but not limited to, medical bills and bills for funeral expenses, that you claim as part of your damages in this case.
4. Any documents in your possession relating to the Ryman family's residence in Los Alamos, New Mexico and the activities of the family while they resided there in the early 1950's including, but not limited to, any and all photographs, letters, diaries, maps, diagrams, etc.
5. Any maps, diagrams, photographs or any other documentary evidence in your possession that show or are intended to show specific geographic locations where Lowell Ryman played, hiked, or otherwise spent any time while he and his family resided in Los Alamos, New Mexico in the early 1950's.
6. Copies of any notes, reports, statements (written or recorded), memorandums, letters, e-mails, diaries and any other documents prepared by or taken from Lowell Ryman that you believe support or in any manner relate to your claim that Lowell Ryman contracted multiple myeloma as a result of exposure to plutonium or other radioactive materials while he resided with his family in Los Alamos, New Mexico.
7. Copies of any and all other documents in your possession including, but not limited to, any documents obtained by you as a result of any research you conducted at the University of New Mexico, in Los Alamos, over the internet, or at any other facility or from any other source, that you believe supports your claim that Lowell Ryman contracted multiple myeloma as a result of exposure to plutonium or other radioactive materials while he resided with his family in Los Alamos, New Mexico.
8. Copies of any correspondence, e-mails or any other documents or materials you have exchanged with Thomas Widner of Chem Risk, Inc., Ken Silver, any medical professional, Jeffrey Ryman or Joyce Ryman regarding any issues raised or claims asserted in this litigation, the lifestyle, activities and excursions into the canyons surrounding Los Alamos by any member of the Elmer Ryman family during the family's residence in Los Alamos or at later times, Lowell Ryman's and Elma Seeman Ryman's contraction of or treatment for multiple myeloma, the cause of the multiple myeloma that killed Lowell Ryman and Elma Seeman Ryman, the probate

and resolution of the Estate of Lowell Ryman, your investigation of the cause of Lowell Ryman's death, the reasons for filing of the Complaint herein including any requests or suggestions by you that others join in or otherwise support the Complaint alleging Lowell Ryman's wrongful death by radiation exposure, and any other conflicts between you and your father's brother and sisters, your mother Joyce Ryman, and your brother Jeffrey Ryman.

9. Copies of any correspondence, e-mails or any other documents or materials you have exchanged with any of Lowell Ryman's siblings or any of his other relatives regarding any issues raised or claims asserted in this litigation, the lifestyle, activities and excursions into the canyons surrounding Los Alamos by any member of the Elmer Ryman family during the family's residence in Los Alamos or at later times, Lowell Ryman's and Elma Seeman Ryman's contraction of or treatment for multiple myeloma, the cause of the multiple myeloma that killed Lowell Ryman and Elma Seeman Ryman, the probate and resolution of the Estate of Lowell Ryman, your investigation of the cause of Lowell Ryman's death, the reasons for filing of the Complaint herein including any requests or suggestions by you that others join in or otherwise support the Complaint alleging Lowell Ryman's wrongful death by radiation exposure, and any other conflicts between you and your father's brother and sisters, your mother Joyce Ryman, and your brother Jeffrey Ryman.
10. A copy of the book or the manuscript for the book you have authored entitled "Powerless Plaintiff: Ten things Every Personal Injury Plaintiff Should Know" and that you have testified (at page 204 of your deposition taken on September 16, 2008) is scheduled to be published at the end of 2008 or beginning of 2009.